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The Honorable Robert J. Bryan

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UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

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10 UNITED STATES OF AMERICA,

NO. CR20-5270 RJB

11 Plaintiff,

STIPULATION OF THE PARTIES RE:
12 v.
13 PRIOR CONVICTION

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RICHARD MARSCHALL,

15 Defendant.

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COMES NOW the United States of America, by and through Tessa M. Gorman,
18 Acting United States Attorney for the Western District of Washington and Marie M.
19 Dalton and Nicholas Manheim, Assistant United States Attorneys for said District; and
20 the Defendant, RICHARD MARSCHALL, and his attorneys, Mohammad Hamoudi and
21 Gregory Geist; and hereby stipulate and agree that the following is true and correct, in
22 lieu of witness testimony:

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1. Defendant stipulates and agrees that he had been convicted of Introduction
24 of a Misbranded Drug into Interstate Commerce under 21 U.S.C. §§ 331 and 333, on
25 September 26, 2011, and that such conviction had become final before March 1, 2020.

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Stipulation of the Parties - 1
U.S. v. Marschall, CR20-5270 RJB

UNITED STATES ATTORNEY
700 STEWART STREET, SUITE 5220
SEATTLE, WASHINGTON 98101
(206) 553-7970

United States v. Marschall
CR20-5270-RJB
Plaintiff's Exhibit No. 30
Admitted _____

2. Defendant stipulates and agrees that he had been convicted of Introduction of a Misbranded Drug into Interstate Commerce under 21 U.S.C. §§ 331 and 333, on October 20, 2017, and that such conviction had become final before March 1, 2020.

3. The parties agree that the foregoing facts are true and correct and that the jury may accept the above stated facts as if they had been proven beyond a reasonable doubt at trial. This Stipulation shall be read to the jury in lieu of witness testimony, admitted into evidence, and provided to the jury as an Exhibit.

SO STIPULATED this 29th day of July, 2021.

Richard Marschall

RICHARD MARSCHALL
Defendant

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**MOHAMMAD HAMOUDI
GREGORY GEIST
Attorneys for Defendant**

Marie Dalton
MARIE M. DALTON
NICHOLAS MANHEIM
Assistant United States Attorney